

**GENWAL COAL COMPANY**

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October 8, 1985

Mr. Lowell Braxton  
Department of Natural Resources  
Division of Oil, Gas and Mining  
355 W. North Temple  
3 Triad Center  
Suite 350  
Salt Lake City, Utah 84180-1203

Re: NOVs N85-4-5-2, 2 of 2, N85-4-12-3, 1 of 3, N85-4-12-3, 3 of 3, ACT 015/032, letter dated Sept. 30, 1985.

Dear Mr. Braxton,

In response to Mr. Hedburg's letter dated September 30, 1985, I would like to respond to Items # 11 and 12.

In response to item #11 relating to the June 21, 1985 letter:

2. Due to the limited space in Crandall Canyon, Genwal Coal Company requests a variance be granted for the requirement of a 100' buffer zone to Crandall Creek. Genwal Coal Company is in the process of determining the location of the Creek in relation to the surface facilities and will forward that information to The Division as soon as it is completed. With the exception of the sediment pond, all the mine facilities will be located on the north side of the Forest Access road, away from the creek.
5. Genwal will remove soil contaminated by individual oil spills greater than two gallons or areas that contain more than 10 cubic feet of oil soaked material. This soil removal criteria does not pertain to areas inside of the berm around the oil storage facility.
6. The contaminated soil will be removed from the mine site and placed in the state approved Sinbad Landfill. The Division is currently reviewing plans for disposal of non-coal waste, and this soil will be disposed of in accordance with these plans. The soil may be temporarily stored on site in the dumpster used for non-coal waste. This dumpster will be emptied at intervals not to exceed 2 months.

7. The access road to the sub-station pad will be controlled by a gate at the bottom of the road to limit access.
8. Genwal Coal feels this area that is designated as a parking area, would be both beneficial to the Forest users as well as the mine. We realize this area will not be included as part of the mine area and would not be utilized for anything except parking by Forest users or mine personnel. Genwal also realizes the commitment to control and process drainage from this area, and that Genwal does not have an exclusive right to this area.
10. Plans have been recently submitted to the Division for the handling of non-coal waste, timbers and oil and gas storage. The map of the surface facilities has been updated to reflect these areas. The oil and gas storage area will have a berm placed around it to contain the spill from the largest container within the storage area. The berm will be constructed with an impermeable fuel resistant layer either of clay or a manmade material covered with dirt. The largest container within the storage area will be 2000 gallons. The bermed area will be no less than 15' x 15', with a berm height of no less than 18", resulting in a holding capacity of no less than 2524 gallons. The berm will have slopes of no greater than 2:1. Non-coal waste will be stored in a dumpster that can be loaded directly on to a truck and hauled to an approved sanitary landfill. Timbers will be stored on the pad until used underground.

In response to the comments received from the Forest Service in their letter dated August 6, 1985:

Comment #1

See above response to #10.

Comment #2

The topsoil stockpile is located at the west end of the property, while most of the mine related activity is located at the east end of the pad. Parking of employees cars will also have a tendency to separate the topsoil stockpile and potential contaminating work. Genwal will maintain a berm around the topsoil stockpile to divert any runoff from the pad site away from the topsoil.

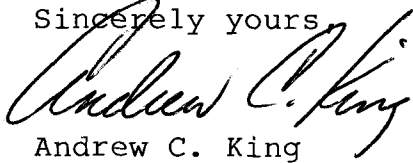
Comment #3

There exists a parking/turnaround area past the mine. Genwal Coal will not use this parking area for mine

related use, i.e. parking, storage etc. This parking area will allow a pick-up/horse trailer combination to have adequate room to turnaround.

If I can be of any further assistance please feel free to contact me at 637-7383. Thank you very much for your time and consideration.

Sincerely yours

A handwritten signature in cursive script, reading "Andrew C. King". The signature is written in dark ink and is positioned below the typed name.

Andrew C. King